

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

DR. JEFFREY M. GOLD, M.D.,

Plaintiff,

vs.

Case No: 22-cv-10699

Hon. Matthew F. Leitman

Mag. Elizabeth A. Stafford

MICHIGAN KIDNEY CONSULTANTS, P.C., *a domestic professional corporation,* **FAHD AL-SAGHIR, M.D.,**
an individual, **FAWAZ AL-EJEL, M.D.,** *an individual,*
GHADEER HANNOUDI, M.D., *an individual,*
KALYANA RAMAMURTHI, M.D., *an individual,*
SUNDEEP DHILLON, M.D., *an individual,*
STEVE RANKIN, M.D., *an individual,*
and **PITI RATANAPANICHKICH, M.D.,** *an individual,*
jointly and severally,

Defendants.

DEBORAH GORDON LAW

Deborah L. Gordon (P27058)
Elizabeth Marzotto Taylor (P82061)
Sarah Gordon Thomas (P83935)
Molly Savage (P84472)
Attorneys for Plaintiff
33 Bloomfield Hills Parkway, Suite 220
Bloomfield Hills, Michigan 48304
(248) 258-2500
dgordon@deborahgordonlaw.com
emarzottotaylor@deborahgordonlaw.com
stthomas@deborahgordonlaw.com
msavage@deborahgordonlaw.com

WOLFSON BOLTON PLLC

Anthony J. Kochis (P72020)
Attorney for Defendants
3150 Livernois, Suite 275
Troy, Michigan 48083
(248) 247-7105
akochis@wolfsonbolton.com

BENESCH LAW

Margo Wolf O'Donnell (Ohio #6225758)
Jordan Call (Ohio #0096040)
Attorneys for Defendants
71 S. Wacker Drive, Suite 1600
Chicago, Illinois 60606
(312) 212-4982
(216) 363-6169
modonnell@beneschlaw.com
jcall@beneschlaw.com

PLAINTIFF'S EX-PARTE MOTION FOR LEAVE TO FILE A RESPONSE
THAT EXCEEDS PAGE LIMIT

Plaintiff Dr. Jeffrey M. Gold, M.D., through his attorneys **Deborah Gordon Law**, hereby requests leave to file his Response to Defendants' Motion to Dismiss Plaintiff's Complaint, which exceeds the 25-page limit set in LR 7.1 (d)(3)(A).

Plaintiff seeks to file a Response that is 27 pages in length. Plaintiff has made a good faith effort to reduce the length of his Brief without sacrificing clarity, and while still adequately addressing the complex factual scenario of this case and the instant dispute, as well as responding to the Defendants' legal arguments.

For these reasons, Plaintiff respectfully requests that this Honorable Court grant his Motion for Leave to File a Response that Exceeds Page Limit.

Dated: August 23, 2022

DEBORAH GORDON LAW

/s/Deborah L. Gordon (P27058)

Elizabeth Marzotto Taylor (P82061)

Sarah Gordon Thomas (P83935)

Molly Savage (P84472)

Attorneys for Plaintiff

33 Bloomfield Hills Parkway, Suite 220

Bloomfield Hills, Michigan 48304

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dgordon@deborahgordonlaw.com

emarzottotaylor@deborahgordonlaw.com

sthamas@deborahgordonlaw.com

msavage@deborahgordonlaw.com

CERTIFICATE OF SERVICE

I hereby certify that on August 23, 2022, I electronically filed the foregoing document with the Clerk of the Court using the ECF system, which will send notification of such filing and service of said documents to all parties through their counsel of record.

DEBORAH GORDON LAW

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Attorneys for Plaintiff

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